



T H E P O W E R O F H I S L I G H T

THE CHRISTIAN BROADCASTING ACADEMY, INC. • KLYT-FM CHRISTIAN HIT RADIO • SWING SHIFT • CHANGE YOUR WORLD

Susan Ness
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

EX PARTE OR LATE FILED

April 13, 1999

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OFFICE OF
COMMISSIONER
SUSAN NESS

Dear Ms. Ness:

Federal Communications Commission
Office of Secretary

I am writing because I am disturbed about the Notice of Proposed rule making the FCC has begun concerning the issue of low-power FM, also known as "micro radio".

The FCC is charged with the incredible task of ensuring that our broadcast and other services are maintained in an environment that is as interference free as possible. I think the Commission is seriously thinking about abandoning its interest in protecting us against interference because they are looking to add these new low-power stations.

No low-power FM stations can be added in most major markets unless the second and third channel interference protections are reduced, thus lessening the FM bands listenability. It seems the long range impact of how these rules will affect the industry were not completely thought out. Consider the local stations who will possibly be adding a digital signal on top of their analog signals within the same band and channel in the near future. Adding a digital signal will improve clarity and service to the public. If micro or low-power stations are added, they have the potential to impair the ability of the digital signals to reach the listeners without interference. I see no forethought in this notice regarding the planned transition to digital audio broadcasting.

Furthermore, in light of the Telecommunications Act of 1996 and the Balanced Budget Act of 1997, I don't understand how the proposed ownership limits for low-power stations or the Commission's desire to license certain favored groups can be reconciled.

What the Commission is proposing is far in advance of the science and research needed to demonstrate that it is possible technically and that it would be good public policy. I know many have interests in becoming broadcasters. There are still AM and FM licenses available for application, some of which are pending even now as the Commission is readying itself to jump into low-power FM.

I'm requesting that you and your fellow commissioners consider placing this low-power FM action on hold until we can be assured the technical details are resolved and the digital audio broadcasting rules are adopted.

Listeners all over America depend on their local broadcasters for important local news, from weather and emergency bulletins to public affairs and other important programming. To bring a new, untested and technically infeasible radio "service" on-line is risky at best and seems to be driven less by public interest and more by the desire to placate pirate radio operators.

Sincerely,

Randy Rich
General Manager
KLYT Radio

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TRANSLATORS: 88.1 FM CLOVIS - LAS CRUCES - ALAMOGORDO • 88.3 FM ALBUQUERQUE - SANTA FE - LOS ALAMOS • 89.3 FM GALLUP • 90.1 FM HOBBS • 90.3 FM SILVER CITY
90.7 FM ANTONITO, CO • 91.1 FM T O R C • 91.5 FM ARTESIA • 91.9 FM RUIDOSO • 92.7 FM LAS VEGAS • 93.5 FM PORTALES • 96.7 FM GRANTS • 97.9 FM ROSWELL